# REDACTED 080278-7

1 the question arises as to why a company with the vast revenues and resources of 2 Verizon has such a hard time making repairs for such a small percentage of its 3 customers who have problems? Ms. Kampert, on the other hand, would lead this 4 Commission to think that only a few customers have problems with service 5 outages (2%) and service affecting trouble (1%). The fact is that Ms. Kampert is 6 citing monthly data that adds up to a 3% monthly trouble report rate that would 7 equal 36% of Verizon's approximately 1 million access lines if you annualized 8 her number. That would appear to add up to 360,000 customer trouble reports 9 annually if this math is correct. This is not an insignificant number of troubles. 10 And the Verizon Florida **Constant and** dollar core budget for wireline maintenance 11 is also not insignificant. Compliance with FPSC repair rules is a multi-million 12 dollar budgetary issue with Verizon, and the company's actual performance 13 shows that the budget trumps customer service almost every time.

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### IV. ROBINSON-- 15% UNHAPPY CUSTOMERS = GOOD SERVICE

16 Fourth, Ms. Robinson cites the fact that customer satisfaction statistics for repair 17 performance from 2001 to 2008 were consistently high. Customer satisfaction 18 surveys have nothing to do with FPSC repair rules. If these issues were relevant, 19 OPC would point out that the chart on page 5 of Ms. Robinson's testimony shows 20 approximately 15% of the Verizon customers surveyed were unhappy with the 21 results of their repairs. This number (15%) is very consistent with Verizon's 22actual performance in failing to meet the PSC standards for repair of service outages and service affecting trouble reports. Unfortunately for Verizon (but good \_23 for customers), the PSC rules require Verizon to repair service outages in 24 24 hours 95% of the time.

BOCLMENT NUMBER-DATE

Verizon goes about the process of responding to customer trouble reports. Importantly, not a single paragraph in those 16 pages describes the budget limitations imposed by the company in 2007 and 2008 that resulted in insufficient manpower to meet the demands for repair of basic service customer trouble reports.

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### INTENTIONAL FAILURE TO MEET PSC REPAIR STANDARDS

A good example of Verizon's intentional failure to meet customer needs in favor of the budget can be seen in the March 21, 2008, message from Russ Diamond to his boss John DePhillips. Diamond states '

# Why were March results so bad? Suri Surinder sent a message to both Diamond and DePhillips on February 12, 2008 stating the following:

"For the month of March, we CANNOT exceed our absolute ot tgts 21 daily....we HAVE to get the target number of TOE off expense." 22

In Verizon jargon that you see in this message, OT stands for overtime, tgt stands for target, and TOE stands for "Technicians off expense," or unavailable to accept repair or installation dispatches that would be charged as expense against the maintenance budget. Once you understand the message, it is not difficult to see why Mr. Surinder's subordinates were relegated to delivering poor service while under-spending their March budget by Exhibit No. \_\_\_(REP-8) This message says "you CANNOT exceed your overtime budget and you HAVE to get the target number of technicians off expense." It is not surprising that March was their worst month.

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### VERIZON "WANTS" TO PROVIDE GOOD SERVICE Mr.

Diamond clearly indicates that the company "wanted" to provide good service to 9 meet its obligations to its customers; however, nowhere does he explain why the 10 company failed to do so. A thorough review of the discovery in this docket 11 provides a clear picture. The company's service performance in 2007 and 2008 12 was all about money, about how to migrate basic customers to high-dollar FIOS 13 service options, and about how to meet Verizon Florida's budgetary commitments 14 to its out-of-state owners. In deference to the good intentions of the hard working 15 employees of Verizon Florida, I would acknowledge through my personal 16 contacts with them that they are a good telephone organization filled with the 17 spirit of service that has characterized Florida telephone companies for decades. 18 The cold, hard truth, however, is that in telephone maintenance the "spirit" may 19 be willing, but the budget makes it all possible. Unfortunately, the "spirit of 20 21 service" does not bring compliance with the FPSC rules if the company does not provide the resources to do so. 22

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My 30 year career with Southern Bell, AT&T and BellSouth started in Florida in the 1950's. In those days, we had long delays for customers to even receive basic

telephone service and generally a long wait when you picked up the phone to get dial tone. In the 1960's, the FPSC's patience with poor telephone service throughout the state had run its course, and the Florida PSC adopted some of the most excellent rule standards in the country to ensure that customers receive good service. The reason these specific rules at issue in this docket are important is that they strike at the heart of the telecommunications company outside plant service organization that includes construction, installation and maintenance personnel a big ticket item in the total budget. In Verizon, this organization spends about

One of the major problems prior to adoption of the FPSC service rules was that 11 Southern Bell, the largest telecommunications company in Florida, did not have 12 sufficient resources to install and maintain basic service in a timely manner. In 13 the 1960s, Southern Bell would concentrate on its major cities-Miami, Orlando, 14 15 Ft. Lauderdale, Jacksonville-during the week and then send its work forces to the rural towns-Belle Glade, Winter Garden, Cocoa, Dunnellon-on overtime 16 during the weekend to take care of the rural area installation and maintenance 17 load. As a result, Florida's rural customers often waited a week or so to receive 18 repair or installation service from Southern Bell. The FPSC resolved that 19 problem by requiring the company to meet installation and repair standards as 20 measured on an exchange by exchange basis every month. That is why we 21 measure company compliance with FPSC installation and repair rules today on an 22 exchange by exchange basis. 23

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By the 1970's, Florida telephone companies were providing some of the very best service results in the nation and the FPSC was largely responsible. Never once did we in Southern Bell (BellSouth) ever understand or communicate to our work forces in Florida that compliance with FPSC rules was optional and not a basic requirement for continued employment. Today, Verizon's complacent attitude regarding a commitment to good service and compliance with FPSC rules is significantly different.

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### GLOSSING OVER THE PROBLEMS

Typical of Verizon's efforts to gloss over its specific failure to meet the FPSC repair standards can be seen in the testimony of Verizon witness Kampert when she attempts to explain the intentional failure of the company to meet the service standards in March and April 2008. Kampert states "Verizon sought to achieve the OOS and NOOS service objectives while addressing a short-term manpower shortage and related budget issues that resulted in a drop in Verizon's performance in March (2008)."

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### 18 SIX DAY WAIT FOR OUT OF SERVICE RESTORATION

Verizon's "short-term manpower shortage and related budget issues" is vividly demonstrated by a March 13, 2008, printout that shows Florida's four operating districts as offering out of service repair commitments of takes and service affecting repair commitments of takes. At the same time, Verizon's North Carolina and South Carolina operations were offering to be commitments for out of service trouble reports (OOS) and takes for not out of service repairs (NOOS). Exhibit No. \_\_(REP-9)

1 2 Prior to the early 2008 problems experienced by the company, Russ Diamond wrote to his boss John DePhillips in November 2007 stating: "the trend for this 3 year is not good Through Sept. we have made the OOS target 73 times and 4 2006." 5 doing well missed 143....we not even as as ате 6 7 DePhillips, in his response, tells Diamond that they need to know how much it 8 would cost to meet the objectives. He goes on to say " 9 10 Exhibit No. 11 (REP-10) 12 13 **VERIZON MOVES 150 TECHS OFF CORE LOAD TO FIOS** 14 Verizon documents show that "In March, we moved about 150 techs from our 15 core operations into our FIOS operation to meet the great demand for new FIOS 16 17 installations. For our core customers, we fixed about 80% of those who were out of 18 19 service within 24 hours and 86% within 48 hours. We have added 150 trained techs to the core operation and our service results have improved already in April 20 21 as a result." Exhibit No. (REP-11) 22 "YOU NEED TO DELIVER ON THE BUDGET JOHN." 23 Verizon's dedication to meeting the budget first and PSC service standards 24 second is also evidenced by the messages between DePhillips and his boss, Suri 25

Surinder, on March 22, 2008. DePhillips first states that they are doing better 1 because they spent **week**, but they are still techs 2 short every day from what they need to maintain PSC targets. (Remember, 3 DePhillips was told on the same day by Diamond that they were going to hold 4 technicians off the repair load "starting Monday". And he also mentions that 5 6 7 Surinder's response is "We need to deliver on budget 8 9 John. No two ways about it. You see the emails I get every day." Exhibit No. 10 (REP 12) 11 The problem with this strategy is clearly spelled out by page 2 of this email, once 12 you understand the significance of the Verizon acronyms. 13 The message was sent on March 22. The first part of the message was intended to 14 convey the thought that the company was catching up on its backlog. The last 15 paragraph, however, states that "Our plan is to be back at the TOE or higher 16 Monday morning." TOE in Verizon jargon means Ervice technicians that are 17 "Technicians Off Expense" assigned to capital projects and not available for 18 installation or repair dispatch. Even after their dismal performance during the 19 first three weeks of March, Verizon was were still willing to remove 20 technicians from their workforce who were capable of providing quick service 21 response to the needs of Florida customers for installation and repair, in order to 22 make good on their budgetary commitments. 23 24

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ordinary telephone repair issues that go back to Angus McDonald and the blizzard
 of 1888, when this telephone lineman braved a Massachusetts blizzard to maintain
 telecommunications between Boston and New York. Mr. McDonald's act of
 dedication to service inspired the famous painting by Ernest Hamlin Baker that
 became the service symbol for the Bell System.

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## 7 Q. DO YOU STILL RECOMMEND THAT THE COMMISSION FINE 8 VERIZON?

9 A. I still recommend that Verizon be fined \$10,000 per violation for each of its 262
10 violations in 2007 and each of its 194 violations in 2008.

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### 12 Q. WHAT IS THE TOTAL AMOUNT OF THE FINE YOU RECOMMEND?

13 Consistent with the Commission's decision to issue a show cause for the company Α. 14 to demonstrate why they should not be fined \$10,000 per violation for each of its 15 456 PSC rule violations, I continue to recommend that a fine of \$4,560,000 be 16 imposed. To gain insight into the financial advantage that is achieved when the 17 company fails to meet its obligations to its customers, I refer you to a document 18 called the "Florida Summer/PSC Plan-2008 dated July 16, 2008. Exhibit No. 19 (REP-14) This document is the company's action-plan to deal with the 20 summer 2008 FIOS and Core repair load. Page 4 of this document indicates that 21 the monthly budget variance needed in order to meet the PSC requirements during 22 the summer peak season is approximately per month. The duration of this show cause order is limited to a 21 month period between January 1, 2007, 23 24 and September 30, 2008. Simple math shows that the maximum advantage to the 25 company by ignoring the rules would be

### 1 **CHEAPER TO PAY THE FINE** 2 Another way to look at the cost savings to the company by not adequately staffing 3 its repair organization is to review the company's Core Staffing Model dated August 13, 2008. Exhibit No. (REP-15) This three page document shows 4 that as of August 2008 the company was short echnicians needed to meet the 5 repair load. Assuming the cost to add a technician and vehicle to the repair staff 6 7 is approximately \$100,000 per year, this adds up to a deficiency of 8 per year that the company needed to spend in order to meet its repair load. Finally, if the company was short technicians needed to cover the repair load 9 (as shown in REP-13), that would be approximately 10 of their total 11 organization that is spending per year, or around 12 Clearly, it is less expensive for Verizon to pay the proposed fine of \$4.6 million in this docket than to hire the people needed to provide adequate service and meet 13 14 the requirements of the PSC rules. 15

### 16 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

17 A. Yes it does.

Docket No. 080278-1L Under Budget Exhibit No. \_(REP-7) Page 1 of 3

CONFIDENTIAL

Russell B. Diamond/EMPL/FL/Verizon 03/21/2008 09:08 AM

To john.dephillips@one.verizon.com@VZNotes

cc kwame.k.trotman@one.verizon.com@VZNotes bcc

Subject Fw: March 2008 Week Four for Hours

John,

Thanks,

Russ Diamond Interim Director - Southeast DRC/EVRC 813-989-7500 Office 813-758-7929 Cell 813-899-4626 Fax ----- Forwarded by Russell B. Diamond/EMPL/FL/Verizon on 03/21/2008 09:05 AM ----

> Kenneth Dee Batha/EMPL/FL/Verizon 03/19/2008 09:43 AM

kwame.k.trotman@one.verizon.com@VZNotes, Russell B. Diamond/EMPL/FL/Verizon@VZNotes,

- Τo joe.lombrana@one.verizon.com@VZNotes, john.dephillips@one.verizon.com@VZNotes ruth.white@one.verizon.com@VZNotes, Kenneth Dee Batha/EMPL/FL/Verizon@VZNotes, Regina H. cc Crosby/EMPL/FL/Verizon@VZNotes, Lynne B.
- Bickers/EMPL/FL/Verizon@V2Notes, Brent P. Christopher/EMPL/FL/Verizon@VZNotes Subject March 2008 Week Four for Hours

Kwame, Joe & Russ,

Here are the week 4 results for hours for CORE IM and FIOS IM.

Thank you Kenny

Kenneth Dee Batha Financial Planning & Analysis 813-483-2632 OFFICE 813-221-7364 FAX Tampa, FL kenny.batha@verizon.com



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Under Budget Exhibit No.\_\_\_(REP-7) Page 2 of 3

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Docket No. 080278-TL Under Budget Exhibit No.\_\_\_(REP-7) Page 3 of 3

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From: "Dephillips, John F." <john.dephillips@one.verizon.com> Sent: Sun, 16 Mar 2008 17:23:49 -0400 To: "Surinder, Narasimhan (Suri)" <narasimhan.surinder@one.verizon.com> Subject: Core load

John DePhillips

Executive Director

813-483-1210

Cannot Exceed Our Targets Exhibit No.\_\_\_(REP-8) Page 1 of 2

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Subject: URGENT & IMPORTANT Fw: 2/12/2008 Toe, Tof with ratio information

John and team, for the fin month of mar which starts soon, we CANNOT exceed our absolute ot tgts daily. Similarly we HAVE to get the tgt number of toe off expense. No two ways about it.

Please send me those numbers when we have have them.

Suri Surinder Senior Vice President/General Manager Southeast Region Verizon Telecom 813-483-1200

: :

> ----- Original Message -----From: brent.p.christopher@core.verizon.com <brent.p.christopher@core.verizon.com> To: Surinder, Narasimhan (Suri); White, Ruth A.; Lafferty, Brett A.; Dephillips, John F.; Diamond, Russell B. (Russ); Lombrana, Joe R.; Foster, Regis C.; Woods, David; Chisolm, Geoffrey Alan (Geoff); Batha, Kenneth D.; Zinck, Kevin W.; Clancy, Colvinita M.; Rosello, Robert; Black, Audrey R.; Christopher, Brent P.; Hunter, Alexander (Alex); Trotman, Kwame K. (Kwame Trotman) Sent: Wed Feb 13 07:31:30 2008 Subject: 2/12/2008 Toe, Tof with ratio information



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Docket No. 080278-TL Cannot Exceed Our Targets Exhibit No.\_\_\_(REP-8) Page 2 of 2

### CONFIDENTIAL

Thanks, Brent Christopher Acting Manager - Operations Metrics (813) 326-2616



Audrey R. Black/EMPL/FL/Verizon 03/13/2008 06:23 AM

cc

То

Docket No. 080278-TL 6 Day Wait for OOS Exhibit No.\_\_\_(REP-9) Page 1 of 2

bcc

Subject Opening Load Report 3/13

REDACTED



Docket No. 080278-TL 6 Day Wait for OOS Exhibit No.\_\_\_(REP-9) Page 2 of 2

CONFIDENTIAL

Thank you, Audrey Black Southeast VDC Force Load Supervisor Ofc - 813-989-7527 Cell - 727-385-1411

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Docket No. 080278-TL Spend The Money On FIOS Exhibit No.\_\_\_(REP-10) Page 1 of 2

From: "Dephillips, John F." <EX:/O=VERIZONONE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=JOHN.DEPHILLIPS89727344> Sent: Wed, 14 Nov 2007 10:35:38 +0000 To: Diamond, Russell B. (Russ) CC: carol.chipman@core.verizon.com Subject: RE: ATTORNEY-CLIENT PRIVILEGED

Russ, we need to have a projection of what it will cost to start making these objectives. Talk to Ruth for some ideas but I wonder what it would have cost in additional OT each month this past year- at least for starters. Looking into the future, your best projection of load, contrasted with budgeted load, and making PSC objectives would cost us XX over the current run rate.

Carol, put this on the agenda for the staff meeting next week.

EVRC and our techs on copper trouble - what are we doing to get those customers over to Fios and what more can be done.

From: russell.diamond@core.verizon.com [mailto:russell.diamond@core.verizon.com] Sent: Tuesday, November 13, 2007 5:09 PM To: Dephillips, John F. Subject: Fw: ATTORNEY-CLIENT PRIVILEGED

John,

The trend for this year is not good. Thru Sept, we have made the OOS in 24 target 73 times and missed 143 versus in 2006, we had made 96 and missed 120. Neither year is good, but we are not even doing as well as 2006. The total is 24 exchange area's times 9 months.

We will work to get better.

Thanks,

Russ Diamond Southeast Region DRC Manager - FiOS 813-989-7502 Office 813-758-7929 Celt 813-985-8558 Fax ---- Forwarded by Russell B. Diamond/EMPL/FUVerizon on 11/13/2007 05:02 PM ----

Debby B. Kampert/EMPL/FL/Verizon

11/13/2007 11:40 AM

Russell B. Diamond/EMPU/FL/Verizon@VZNotes, john.dephillips@one.verizon.com@VZNotes, de.oroark@mci.com	το
	22
Debby B. Kamper//EMPL/FL/Verizon@VZNotes	Subject

ATTORNEY-CLIENT PRIVILEGED



Docket No. 080278-TL 150 Techs Moved Out of Core Exhibit No.\_\_\_(REP-11) Page 1 of 6

Page 1 of 6

### BROAD CONTEXT

We are committed to our customers and our community in Tampa Bay through our actions, not just our words.

- We have invested \$1B in building the FiOS intrastructure. No other company in any industry in this area has made this
  kind of investment in this area ever before, including our current competitors.
- We have 10,000 emps in the area focused on supporting this infrastructure with great customer service everyday, living, working, paying taxes, spending money and supporting the community. We are one of the largest private employers in Tampa Bay. We spend hundreds of millions of dollars every year in salaries and wages to our employees, and this is money that goes right into the local economy.
- We will have close to 1M premises passed by the end of this year. All of these customers will have access to a 21st century network with fiber all the way to the home, unlike any other alternative they have, and unlike other consumers anywhere in Florida. They have access to the best High Definition TV, the fastest internet speeds and the clearest voice service anywhere on the planet.
- This kind of financial investment is the strongest expression of a company's commitment to its customers. It does not
  excuse any service blips, but it reinforces our deep interest in ensuring that our customers are happy, and in leveraging
  this high level of investment with the right levels of service.

Customer acceptance of FIOS in Tampa has been excellent, and that is a vote by our customers in the best way possible through their wallets.

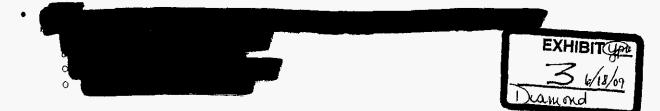


- Sales run rates are up by similar and Feb this year.
- We are up to with us with us.
- We now have
   We now have
   Berner to an annual revenue generated by the FiOS TV and internet business right here in Florida.
- All this doesn't happen without a robust level of customer satisfaction.

We have won substantial critical acclaim for FiOS from a number of independent, objective sources across the country, not just for the product, but for the service as well.

- PC World magazine rated FIOS in the top 5 of 100 best products for 2007, a roster of the finest products and services of the past 12 months selected based on exemplary design, features, performance and innovation.
- 40k-50k readers of PC World and Computer World magazines have ranked FiOS internet #1 with top scores across the board in overall satisfaction, connection reliability, download and upload speeds, customer service & technical support.
- Consumer Reports rated FiOS TV as the best choice overall against all alternatives, including satellite and cable. The only
  negative was that it was not available in enough places. FiOS internet and phone service also got top scores in their
  survey.

Our service results in Southeast on FIOS are very competitive, and comparable to benchmark companies across a range of industries, besides being among the best in the country within VZ.



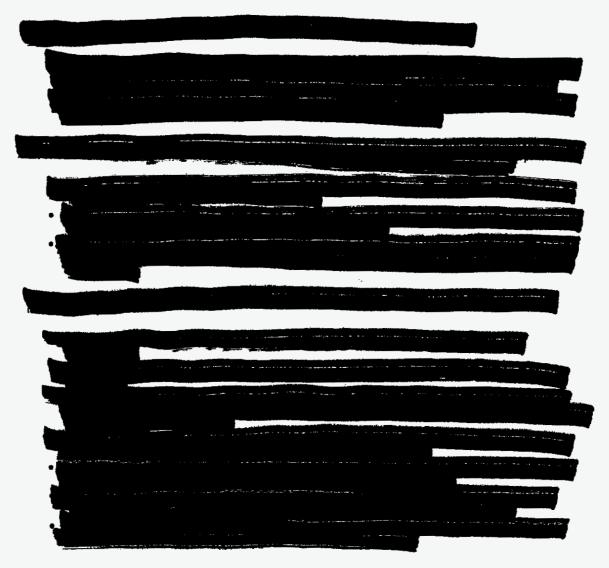
Confidential and proprietary material not for public disclosure without prior consent. Dissemination to a wider audience within or outside the business will result in immediate consequences, up to and including termination.

Docket No. 080278-TL 150 Techs Moved Out of Core Exhibit No.\_\_\_(REP-11) Page 2 of 6

Page 2 of 6



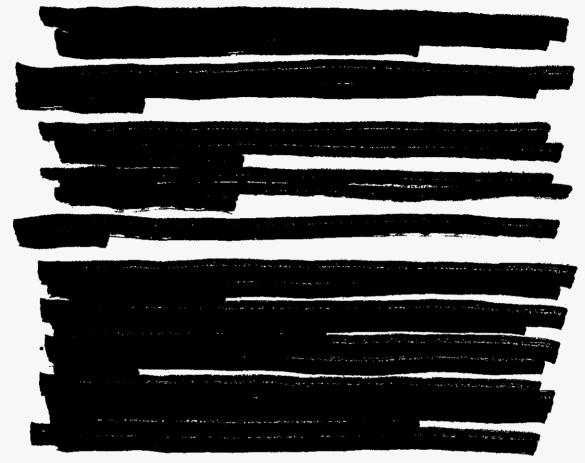
### **CENTER ACCESS & REPEAT CALL ISSUES**



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Docket No. 080278-TL 150 Techs Moved Out of Core Exhibit No.\_\_\_(REP-11) Page 4 of 6

Page 4 of 6



### FIELD INTERVAL ISSUES

Our performance in terms of installation and repair intervals, and met commitments has been stellar on FiOS. It has been excellent on our copper network also, except for one month, due to special circumstances.

- •
- We offer 2 hour windows on all FiOS installation appointments, as well as Saturday and Sunday appointments, unlike a lot of other regions in the country.
- For our core customers, we fixed about 80% of those who were out of out of service within 24 hours in the 1<sup>4</sup> quarter, and about 86% within 48 hours. These numbers were even higher in the first two months of the year.

The blip in our core service numbers in March is a one time occurrence due to extenusting circumstances.

- In March, we moved about 150 techs from our core operation into our FiOS operation to meet the great demand for new FiOS installations.
- This resulted in the need to backfill the same number of techs in our core operations.
- We re-trained about 150 of our employees who were doing infrastructure build work so that they could do copper installation and repair work for our core customers.

Confidential and proprietary material not for public disclosure without prior consent. Dissemination to a wider audience within or outside the business will result in immediate consequences, up to and including termination.

Docket No. 080278-TL We Need to Deliver on Budget Exhibit No.\_\_(REP-12) Page 1 of 2

From: "Surinder, Narasimhan (Suri)" <EX:/O=VERIZONONE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=NARASIMHAN.SURINDER> Sent: Sat, 22 Mar 2008 16:55:19 +0000 To: Dephillips, John F. Subject: Re: Core Update - 3/22/08

Thanks. We need to deliver on budget john, as you know. No two ways about it. You see the emails I get every day. Any service impact needs to be mitigated through carefully managed cust communication. I would stay the course that russ is laying out and not deviate from it.



Suri Surinder Senior Vice President/General Manager Southeast Region Verizon Telecom 813-483-1200

---- Original Message ----From: Dephillips, John F. To: Surinder, Narasimhan (Suri) Sent: Sat Mar 22 12:08:03 2008 Subject: FW: Core Update - 3/22/08

The bottom line is that we will go into next week in much better shape as a result of spending the in reduced TOE tast week. But... we are not really back to normal service levels and even with the much improved productivity we are getting, we are the table to be short every day from what we need to maintain PSC targets and minimize carry over without using OT. I have asked for a new detailed projection of our budgeted manpower capacity charted with the forecasted load for the rest of the year and should have it Monday. I realize that the budget is set, regardless of our service levels but I want us to know where this is going.

John DePhillips

Executive Director

813-483-1210

From: russell.diamond@core.verizon.com [mailto:russell.diamond@core.verizon.com] Sent: Saturday, March 22, 2008 11:05 AM To: Dephiltips, John F.

Docket No. 080278-TL We Need to Deliver on Budget Exhibit No.\_\_\_(REP-12) Page 2 of 2

Cc: Trotman, Kwame K. (Kwame Trotman); Smith, Scott J. Subject: Core Update - 3/22/08

John,

For the week, we ended up using textra techs on straight time for 4 days (same as using techs for 3 days). The extra jobs cleared is right at the problem of the problem of the entire work force was lower due to it being Good Friday and we had a lot of vacation days.

The extra techs this week did clear up the majority of the work we had been carrying over for the past few weeks (still some in Southern Suncoast). We should have all the carryover/backlog clear by Monday morning. The week started with over the carryovers in Florida alone.

The current commitments for repair and orders remain extended in Florida. Carolina's are close to normal commitment/due dates. The total trouble we are holding is the second or the second sec

As to service orders, we should have I/T orders at Day 4, with C orders at Day 10. Total orders scheduled in the future and past due are 3,200. A normal future load for orders would be about 2,000.

Our plan is to be back at the TOE or higher Monday morning with plans to make up the extra cost though the next 3 weeks of the month. I believe we have a good plan in place to minimize future carryovers.

Thanks,

Russ Diamond Interim Director - Southeast DRC/EVRC 813-989-7500 Office 813-758-7929 Cell 813-899-4626 Fax Summer/PSC Plan Exhibit No.\_\_\_(REP-14) Page 2 of 11

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What can we expect

Summer/PSC Plan Exhibit No.\_\_\_(REP-14) Page 3 of 11

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Docket No. 080278-TL Summer /PSC Plan Exhibit No.\_\_\_(REP-14) Page 4 of 11

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# **ORE - Priority of Increased Capacity**

Summer/PSC Plan Exhibit No. (REP-14) Page 5 of 11

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Docket No. 080278-TL Summer/PSC Plan Exhibit No.\_\_\_(REP-14)

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akehaven District Daily Capacity



# **Upper District Daily Capacity**

Docket No. 080278-TL Summer/PSC Plan Exhibit No.\_\_\_(REP-14) Page 7 of 11

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Docket No. 080278-TL Summer/PSC Plan Exhibit No.\_\_\_(REP-14) - Page 8 of 11

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Southern District Daily Capacity

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Docket No. 080278-TL Summer/PSC Plan Exhibit No.\_\_\_(REP-14) Page 9 of 11

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Breakdown of PSC OOS Misses – May 2008

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Docket No. 080278-TL Short 151 Techs Exhibit No. (REP-15) Page 3 of 3





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